

# **Exhibit Q**

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December 14, 2006

**VIA ELECTRONIC MAIL**

Joseph Pizzuro, Esq.  
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101 Park Avenue  
New York, NY 10178

Re: ***Magten Asset Management Corp. and Law Debenture Trust  
Co. v. Northwestern Corp.; C.A. No. 04-1494-JJF***

Dear Joe:

I write to express my disappointment with the positions taken in your letter dated December 11, which regrettably leave us with no choice but to file a motion to compel.

As to your continuing refusal to even provide a date by which you will complete your production of documents, there appears to be nothing to be said that has not already been said, except to note that your attempt to tie your obligation to commit to such a date with final agreement on our withdrawal of certain requests in return for an acceptable stipulation is brand new, and was not mentioned in any of our prior discussions. Obviously you could provide us with a date by which you could complete production of all documents other than those which would be unnecessary if agreement is reached on the terms we have discussed (with the caveat that the need to produce additional documents might affect the timing), but you have not done so.

I am, frankly, even more troubled by your position with respect to documents your client has already produced to the SEC. You do not deny that these documents have long since been assembled in a form in which they could readily be produced to us and do not require privilege review before production. There is no good reason why they have not already been produced to us, or why you cannot now produce them immediately. Especially given the focus in Judge Case's decision on the threshold fraud issue, which relates to exactly the same false and misleading NorthWestern financial statements your client has publicly admitted are the subject of the SEC's

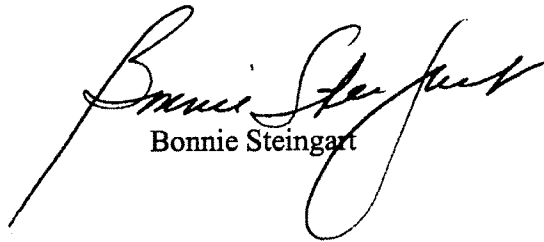
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inquiry, we cannot imagine that there are any documents in the SEC production which would not be relevant to this litigation. We are also highly skeptical that there are any such documents which would not be responsive to one or more of the outstanding requests as to which you have indicated you will produce responsive documents.

Given the general professionalism we have previously experienced from you and your firm and the fact that working out issues like these consensually is usually to the benefit of all parties to a litigation, we are somewhat puzzled as to the reason for the continued delay and stonewalling. It suggests some motive on the part of your client above and beyond the generic tendency sometimes displayed by defendants to favor delay for its own sake. In particular, we have begun to wonder whether your client is hoping to keep certain damaging information out of view until the Montana Public Service Commission and other regulators have completed their review of NorthWestern's proposed transaction with BBI. Your client should assume that we will take any and all steps necessary to ensure prompt production of these materials.

Yours truly,



Bonnie Steingart

cc: Gary L. Kaplan, Esquire  
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